

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

DURA AUTOMOTIVE SYSTEMS, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 19-12378 (KBO)

(Jointly Administered)

Hearing Date: To Be Scheduled If Necessary

Objection Deadline: June 11, 2020 at 4:00 p.m. (ET)

**FIFTH MONTHLY FEE APPLICATION OF BENESCH, FRIEDLANDER, COPLAN &  
ARONOFF LLP, FOR COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED AS DELAWARE COUNSEL TO THE  
OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD FROM  
APRIL 1, 2020 THROUGH APRIL 30, 2020**

Name of Applicant:	Benesch, Friedlander, Coplan & Aronoff LLP
Authorized to Provide Professional Services to:	Official Committee of Unsecured Creditors of Dura Automotive Systems, LLC, <i>et al.</i>
Date of Retention:	January 6, 2020, <i>nunc pro tunc</i> to November 12, 2019
Period for which Compensation and Reimbursement of Expenses is Sought	April 1, 2020 through April 30, 2020
Amount of Compensation Sought as Actual, Reasonable, and Necessary	\$105,819.00
Amount of Expense Reimbursement Sought As Actual, Reasonable, and Necessary:	\$2,806.25

This is a   X   monthly    interim    final application.

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<sup>1</sup> The Debtor entities in these chapter 11 cases, along with the last four digits of each Debtor entity's federal tax identification number, are: Dura Automotive Systems Cable Operations, LLC (7052); Dura Automotive Systems, LLC (8111); Dura Fremont L.L.C. (1252); Dura G.P. (8092); Dura Mexico Holdings, LLC (4188); Dura Operating, LLC (2304); and NAMP, LLC (3693).

**SUMMARY OF PRIOR MONTHLY FEE STATEMENTS**

<b>Date Filed</b>	<b>Period Covered</b>	<b>Requested</b>		<b>Paid</b>		<b>Holdback</b>
		<b>Fees</b>	<b>Expenses</b>	<b>Fees [80%]</b>	<b>Expenses [100%]</b>	<b>Fees [20%]</b>
First Monthly 1/27/2020 D.I. 589	11/12/2019- 12/31/2019	\$117,134.50	\$281.88	\$93,707.60	\$281.88	\$23,426.90
Second Monthly 2/27/2020 D.I. 720	1/1/2020- 1/31/2020	\$133,610.50 (pending)	\$2,407.95	\$106,888.40	\$2,407.95	\$26,722.10 (pending)
Third Monthly 3/23/2020 D.I. 800	2/1/2020- 2/29/2020	\$190,109.50 (pending)	\$3,806.30	\$152,087.60	\$3,806.30	\$38,021.90 (pending)
Fourth Monthly 4/22/2020 D.I. 909	3/1/2020- 3/31/2020	\$106,150.00 (pending)	\$3,982.70 (pending)	\$84,920.00 (pending)	\$3,982.70 (pending)	\$21,230.00 (pending)
<b>Total</b>		\$547,004.50	\$10,478.83	\$437,603.60	\$10,478.83	\$109,400.90

Pursuant to sections 328, 330, and 1103 of chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Bankruptcy Rules”), the *Order Authorizing Employment and Retention of Benesch, Friedlander, Coplan & Aronoff LLP as Delaware Counsel to the Official Committee of Unsecured Creditors Nunc Pro Tunc to November 12, 2019* [Docket No. 532] (the “Retention Order”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 389] (the “Interim Compensation Order”), the law firm of Benesch, Friedlander, Coplan & Aronoff LLP (“Benesch”), Delaware counsel to the Official Committee of Unsecured Creditors (the “Committee”) appointed in the chapter 11 cases of the above-captioned debtors and debtors in possession (collectively, the “Debtors”), hereby files this monthly fee application (this “Monthly Fee Application”) for: (i) compensation in the amount of \$84,655.20 for the reasonable and necessary legal services Benesch rendered to the Committee from April 1, 2020 through April 30, 2020 (the “Fee Period”) (80% of \$105,819.00); and (ii) reimbursement for the actual and necessary expenses that Benesch incurred, in the amount of \$2,806.25, during the Fee Period.

### **Itemization of Services Rendered and Expenses Incurred**

1. In support of this Monthly Fee Application, attached are the following exhibits:

- **Exhibit A** is a schedule providing certain information regarding the Benesch attorneys and paraprofessionals for whose work on these chapter 11 cases compensation is sought in this Monthly Fee Application. Attorneys and paraprofessionals of Benesch have expended a total of 209.8 hours in connection with these chapter 11 cases during the Fee Period.
- **Exhibit B** is a schedule of the number of hours expended and fees incurred (on an aggregate basis) by Benesch attorneys and paraprofessionals during the Fee Period with respect to each of the subject matter categories Benesch established in accordance with its internal billing procedures. As referenced in **Exhibit B**,

Benesch incurred \$105,819.00 in fees during the Fee Period. Pursuant to this Monthly Fee Application, Benesch seeks reimbursement for 80% of such fees (\$84,920.00 in the aggregate).

- **Exhibit C** is a schedule for the Fee Period, setting forth the total amount of reimbursement sought with respect to each category of expenses for which Benesch is seeking reimbursement in this Monthly Fee Application. All of these disbursements comprise the requested sum for Benesch's out-of-pocket expenses. As referenced in **Exhibit C**, Benesch incurred \$2,806.25 in expenses during the Fee Period.
- **Exhibit D** consists of Benesch's records of fees incurred during the Fee Period in the rendition of the professional services to the Committee.

#### **Reservation of Rights**

Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Application due to delays caused by accounting and processing during the Fee Period. Benesch reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent fee applications will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, Local Bankruptcy Rules, and the Interim Compensation Order.

*[Remainder of page intentionally left blank]*

WHEREFORE, Benesch respectfully requests allowance of its fees and expenses incurred during the Fee Period in the total amount of \$87,461.45, consisting of (a) \$84,655.20, which is 80% of the fees incurred by the Committee for reasonable and necessary professional services rendered by Benesch; and (b) \$2,806.25 for actual and necessary costs and expenses, and that such fees and expenses be paid as administrative expenses of the Debtors' estates.

Dated: May 21, 2020

BENESCH, FRIEDLANDER, COPLAN &  
ARONOFF LLP

/s/ Jennifer R. Hoover

Jennifer R. Hoover (DE No. 5111)

Kevin M. Capuzzi (DE No. 5462)

John C. Gentile (DE No. 6159)

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*Counsel to the Official Committee of  
Unsecured Creditors*

**EXHIBIT A****Timekeeper Summary**

<b>Name of Professional</b>	<b>Position with the Applicant and Number of Years in that Position</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
William M. Alleman, Jr.	Partner since 2019. Member of the DE Bar since 2010.	\$495.00	5.5	\$2,722.50
Kevin M. Capuzzi	Partner since 2019. Member of the DE Bar since 2010. Member of the NJ Bar since 2015.	\$495.00	52.5	\$25,987.50
Jennifer R. Hoover	Partner since 2012. Member of the DE Bar since 2007. Member of the PA and NJ Bars since 2001.	\$610.00	52.8	\$32,208.00
Sven T. Nylen	Partner since 2019. Member of the IL Bar since 2002.	\$605.00	21.7	\$13,128.50
Christopher J. Letkewicz	Partner since 2020. Member of the IL Bar since 2009.	\$605.00	19.3	\$11,676.50
John C. Gentile	Associate since 2017. Member of the DE Bar since 2015. Member of the PA Bar since 2016.	\$355.00	46.1	\$16,365.50
LouAnne Molinaro	Paralegal since 2017.	\$315.00	11.3	\$3,559.50
Steven Delaney	Litigation Support Manager since 2010.	\$285.00	0.6	\$171.00
Blended Rate/Total		\$504.38	209.80	\$105,819.00

**EXHIBIT B****Statement of Fees By Subject Matter**

<b>Matter Description</b>	<b>Total Hours Billed</b>	<b>Total Fees Requested</b>
Case Administration (includes budgeting)	26.6	\$13,357.00
Asset Disposition	18.6	\$10,006.00
Meetings/Communications with Creditors	1.2	\$676.00
Employment and Fee Applications	41.9	\$16,208.50
Litigation	110.0	\$59,701.00
Financing/Cash Collateral	10.8	\$5,529.00
Plan & Disclosure Statement	0.7	\$341.50
Total	209.80	\$105,819.00

**EXHIBIT C**

**Expense Summary**

<b>Expense Category</b>	<b>Service Provider</b>	<b>Amount</b>
Outside Professional Services	DLS	\$213.25
Hearing Conference Calls	CourtCall	\$33.00
E-Discovery/Document Platform	Everlaw	\$2,560.00
Total		\$2,806.25



**EXHIBIT D**

**Detailed Fee Records**

Dura Automotive Systems, LLC et al - Official Cotee of  
Unsecured Creditors

FEE STATEMENT FOR SERVICES RENDERED  
AND EXPENSES INCURRED BY  
BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP  
FOR THE PERIOD APRIL 1, 2020 THROUGH APRIL 30, 2020

<u>Service Category</u>	<u>Tab</u>
Case Administration (Includes Budgeting)	1
Asset Disposition	2
Meetings and Communications with Creditors	3
Employment and Fee Applications	4
Litigation/Other Contested Matters	5
Financing/Cash Collateral	6
Plan and Disclosure Statement	7
<u>Expenses</u>	
General	8

BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP  
SUMMARY OF SERVICES RENDERED  
APRIL 1, 2020 THROUGH APRIL 30, 2020

<u>Attorney Name</u>		<u>Hourly Rate</u>	<u>Hours</u>	<u>Amount</u>
<u>PARTNER</u>				
William M. Alleman, Jr.	(WMA)	\$495.00	5.50	\$2,722.50
Kevin M. Capuzzi	(KMC)	\$495.00	52.50	\$25,987.50
Jennifer R. Hoover	(JRH)	\$610.00	52.80	\$32,208.00
Christopher J. Letkewicz	(CJL)	\$605.00	19.30	\$11,676.50
Sven T. Nylen	(STN)	\$605.00	21.70	\$13,128.50
			<u>151.80</u>	<u>\$85,723.00</u>
<u>ASSOCIATE</u>				
John C. Gentile	(JCG)	\$355.00	46.10	\$16,365.50
			<u>46.10</u>	<u>\$16,365.50</u>
<u>PARALEGAL</u>				
Steven Delaney	(SD )	\$285.00	0.60	\$171.00
Louanne Molinaro	(IM )	\$315.00	11.30	\$3,559.50
			<u>11.90</u>	<u>\$3,730.50</u>
TOTAL:			<u>209.80</u>	<u>\$105,819.00</u>

Combined Average Hourly Rate: \$504.38

## Case Administration (Includes Budgeting)

FOR PROFESSIONAL SERVICES RENDERED THROUGH APRIL 30, 2020

Date	Atty	Services	Hours
04/01/20	KMC	Review communication form Debtors' counsel regarding April 6 hearing (0.1)	0.10
04/02/20	KMC	Communicate with J. Hoover and Dentons regarding omnibus hearing date for challenge extension motion (0.2), communicate with Debtors' counsel regarding same (0.2), review agenda for April 6 hearing (0.1), review omnibus hearing date order (0.1), and participate in committee conference call (0.6)	1.20
04/02/20	JRH	Attend and participate in committee conference call (.8)	0.80
04/02/20	CJL	Participate in committee call concerning sales process updates and potential litigation strategy	0.60
04/02/20	STN	Prepare for and attend Committee update call, and follow-up conference with C. Letkewicz regarding same and complaints	0.70
04/02/20	JCG	Emails to/from K. Capuzzi and D. Brogan regarding adjourned matters for April 6 (.1)	0.10
04/02/20	JCG	Emails to/from D. Brogan and M. Lopez regarding cancellation of hearings and related adjournments (.2)	0.20
04/06/20	KMC	Participate in committee conference call (0.5)	0.50
04/06/20	CJL	Participate in committee call concerning updates to sales process and overall case strategy	0.40
04/06/20	STN	Prepare for and attend Committee update call	0.50
04/09/20	KMC	Communicate with Dentons regarding April 13 hearing (0.1), communicate with Bayard regarding agenda (0.1), communicate with Bayard regarding COC for agenda (0.1), review agenda for April 13 hearing (0.2), and communicate with J. Hoover and S. Nylen regarding same (0.2)	0.70
04/09/20	JCG	Emails to/from D. Brogan regarding continuation of various motions before the court (.1)	0.10
04/09/20	LM	Emails regarding motion filing	0.50
04/09/20	LM	E-file certification of counsel and upload order	0.40

Date	Atty	Services	Hours
04/09/20	LM	Download, save, and circulate agenda for 4/13 hearing	0.20
04/10/20	KMC	Review communication from Court regarding April 13 hearing matters (0.1), prepare responsive communication to Court (0.7), communicate with J. Hoover and S. Nylen regarding same (0.2 ), communicate with J. Hoover regarding adjourning motion to extend challenge deadline (0.2), draft further communication to Court regarding same (0.2), review and revise notice of adjournment of April 13 hearing (0.2), attend to filing of same (0.1), communicate with Bayard regarding April 13 adjourning (0.2), and review agenda cancelling hearing (0.1)	2.00
04/10/20	JRH	Review communication from Court regarding April 13 hearing matters (0.1), prepare responsive communication to Court (0.7), communicate with K. Capuzzi and S. Nylen regarding same (0.2 ), communicate with K. Capuzzi regarding adjourning motion to extend challenge deadline (0.2), draft further communication to Court regarding same (0.2), review and revise notice of adjournment of April 13 hearing (0.2), attend to filing of same (0.1), communicate with Bayard regarding April 13 adjourning (0.2), and review agenda canceling hearing (0.1)	2.00
04/10/20	LM	Arrange for Court Call appearances for 4/13 hearing	0.40
04/10/20	LM	Emails regarding due dates and other case related items	0.30
04/10/20	LM	E-file re-notice of motion	0.40
04/13/20	KMC	Participate in committee professionals call (0.6), participate committee conference call (0.5), review April 16 hearing notice (0.1), and communicate with L. Molinaro regarding attendance at same (0.1)	1.30
04/13/20	CJL	Participate in committee call discussing updates to sales process and motion for derivative standing	0.40
04/13/20	STN	Prepare for and attend committee update conference	0.40
04/13/20	JCG	Emails to/from DLS and L. Molinaro regarding filing of AOS regarding the re-notice of hearing and notice of motion for standing (.1)	0.10
04/13/20	LM	E-file affidavit of service	0.20
04/13/20	LM	Download, save, and circulate recent filings	0.50
04/13/20	LM	Schedule Court call appearances for 4/16/20 hearing	0.30
04/14/20	KMC	Review April 16 hearing agenda (0.1)	0.10

Date	Atty	Services	Hours
04/16/20	KMC	Review agenda canceling April 16 hearing (0.1)	0.10
04/16/20	LM	Emails regarding hearing	0.30
04/17/20	LM	E-file affidavit of service	0.20
04/17/20	LM	Schedule Court Call appearances for K. Capuzzi regarding Zohar hearing	0.20
04/18/20	JRH	Attend and participate in professionals call and discuss European APA and next steps (1.4)	1.50
04/20/20	KMC	Participate in committee conference call (0.9)	0.90
04/20/20	JRH	Prepare for (.2) and attend committee conference. call (.8)	1.00
04/20/20	STN	Attend committee update conference call	0.80
04/21/20	LM	Download, save, and forward Zohar documents to K. Capuzzi for hearing	0.50
04/22/20	JRH	Conf. call with J. Irving regarding strategy and and next steps (sale,etc.)	0.20
04/23/20	KMC	Review April 27 agenda (0.1), communicate with Debtors' counsel regarding same (0.1), and review amended agenda for April 27 hearing (0.1)	0.30
04/23/20	JCG	Review amended notice of agenda for hearing on 4/27 (.1)	0.10
04/23/20	LM	Emails regarding potential filing	0.20
04/25/20	JRH	Emails regarding status with Dentons and sale related matters	0.30
04/27/20	KMC	Participate in committee conference call	1.00
04/27/20	JRH	Attend and participate in committee conf. call.	1.00
04/27/20	CJL	Prepare for and participate in committee call regarding updates to sales process and strategy in response and Patriarch requests for production	1.00
04/27/20	JCG	Emails to/from K. Capuzzi and debtors' professionals regarding amounts owed in light of possible sale (.2); more emails to/from K. Capuzzi and J. Hoover regarding requested amounts and likely future amounts to budget (.3); emails to/from debtors' professionals to confirm fee amounts and related budget concerns (.3)	0.80

Date	Atty	Services	Hours
04/27/20	JCG	Follow up with D. Cook regarding LEDES information for Dentons US (.1); email drafted and sent to UST regarding submission of all LEDES files from Nov. 2019-March 2020 for Dentons (.2)	0.30
04/28/20	KMC	Review affidavit of service of fee applications (0.1) and communicate with J. Gentile regarding filing of same (0.1)	0.20
04/28/20	LM	Efile affidavit of service of filings	0.30

## Case Administration (Includes Budgeting)

<u>Attorney Name</u>		<u>Hourly Rate</u>	<u>Hours</u>	<u>Amount</u>
<u>PARTNER</u>				
Kevin M. Capuzzi	(KMC)	\$495.00	8.40	\$4,158.00
Jennifer R. Hoover	(JRH)	\$610.00	6.80	\$4,148.00
Christopher J. Letkewicz	(CJL)	\$605.00	2.40	\$1,452.00
Sven T. Nysten	(STN)	\$605.00	2.40	\$1,452.00
			<u>20.00</u>	<u>\$11,210.00</u>
<u>ASSOCIATE</u>				
John C. Gentile	(JCG)	\$355.00	1.70	\$603.50
			<u>1.70</u>	<u>\$603.50</u>
<u>PARALEGAL</u>				
Louanne Molinaro	(LM )	\$315.00	4.90	\$1,543.50
			<u>4.90</u>	<u>\$1,543.50</u>
		<u>TOTAL:</u>	<u>26.60</u>	<u>\$13,357.00</u>



## Asset Disposition

FOR PROFESSIONAL SERVICES RENDERED THROUGH APRIL 30, 2020

Date	Atty	Services	Hours
04/01/20	KMC	Review Adient PLC cure objection (0.2)	0.20
04/02/20	STN	Briefly review summary of Non-US asset purchase offer	0.10
04/03/20	KMC	Review Nissan cure objection (0.3) and review CH Robinson cure objection (0.3)	0.60
04/06/20	KMC	Review Wald cure objection (0.2) and review Nissan cure objection (0.2)	0.40
04/09/20	KMC	Review Lincoln sale update (0.1)	0.10
04/13/20	KMC	Review Dajaco cure objection (0.1)	0.10
04/14/20	KMC	Review Constellation Energy supplemental cure objection (0.2)	0.20
04/15/20	JRH	Conference call with J. Irving regarding sale status, discussions with Debtors' counsel and next steps (.5)	0.50
04/16/20	KMC	Review Lincoln sale updates and communications regarding same (0.3)	0.30
04/16/20	JRH	Review summary emails regarding status of sale efforts, etc. (.3)	0.30
04/17/20	KMC	Review notice of entry in APA (0.1) and review committee communications regarding same (0.2)	0.30
04/18/20	KMC	Review email communication to vendors regarding North American WARN notice (0.1), participate in call with committee professionals regarding European APA (1.3), and communicate with J. Hoover regarding next steps (0.2)	1.60
04/18/20	JRH	Review draft APA in advance of call (1.5)	1.50
04/19/20	KMC	Review Lincoln summary of European APA terms (0.7)	0.70
04/19/20	JRH	Review emails from Lincoln and further discussion on APA (.3)	0.30
04/20/20	KMC	Review Chubb Insurance sale objection (0.5)	0.50
04/20/20	JRH	Review update email to Committee in advance of call (.3)	0.30

Date	Atty	Services	Hours
04/20/20	STN	Strategy conference with J. Hoover on proposed sale as to transfer of Patriarch claims	0.30
04/20/20	STN	Review APA and Lincoln high level summary in preparation for committee update, including analysis of acquisition of Patriarch claims	0.50
04/20/20	JCG	Review summary of APA related to the purchase of European based assets by Lincolns (.5); conference call with creditors committee and co-counsel regarding same (.9)	1.40
04/22/20	JRH	Call with J. Irving and Lincoln regarding status of sale process, DIP financing matters and next steps	0.80
04/25/20	JRH	Review summary email from J. Irving regarding overall status and communications with Committee re: APA	0.40
04/26/20	KMC	Participate in committee professionals' call regarding sale matters (0.6)	0.60
04/27/20	KMC	Review communication and spreadsheet from Debtors' counsel regarding fee escrow for sale (0.1) and communicate with J. Hoover and J. Gentile regarding same (0.2)	0.30
04/29/20	KMC	Review communications North American sale matters (0.3) and participate in committee professionals call regarding same (0.7)	1.00
04/29/20	JRH	Multiple emails with Dentons re: case status and potential wind down; conf. call with Committee professionals regarding sale status and wind down efforts (.5)	0.50
04/29/20	JRH	Multiple emails regarding case status and sale matters with Dentons and Lincoln	0.20
04/30/20	KMC	Review notice of North American APA (0.1), review communications between Debtors and Committee professionals regarding same (0.3), and communicate with Committee professionals regarding strategy call (0.1)	0.50
04/30/20	JRH	Review and respond to multiple emails re: APA matters and next steps	0.30
04/30/20	JRH	Review US APA in connection with sale objection analysis (1.5); review European APA and conf. internally regarding same (1.8)	3.30
04/30/20	JCG	Review notice of sale of North American assets and review APA (.5)	0.50

## Asset Disposition

<u>Attorney Name</u>		<u>Hourly Rate</u>	<u>Hours</u>	<u>Amount</u>
<u>PARTNER</u>				
Kevin M. Capuzzi	(KMC)	\$495.00	7.40	\$3,663.00
Jennifer R. Hoover	(JRH)	\$610.00	8.40	\$5,124.00
Sven T. Nylan	(STN)	\$605.00	0.90	\$544.50
			<u>16.70</u>	<u>\$9,331.50</u>
<u>ASSOCIATE</u>				
John C. Gentile	(JCG)	\$355.00	1.90	\$674.50
			<u>1.90</u>	<u>\$674.50</u>
			<u>TOTAL:</u>	<u>18.60</u>
				<u>\$10,006.00</u>

Meetings and Communications with Creditors

FOR PROFESSIONAL SERVICES RENDERED THROUGH APRIL 30, 2020

Date	Atty	Services	Hours
04/14/20	JCG	Phone call with L. Rich from Tara Technologies regarding cure objection and status of case (.2)	0.20
04/27/20	STN	Prepare for and attend Committee update meeting on status and outstanding litigation items	1.00

## Meetings and Communications with Creditors

<u>Attorney Name</u>		<u>Hourly Rate</u>	<u>Hours</u>	<u>Amount</u>
<u>PARTNER</u>				
Sven T. Nylén	(STN)	\$605.00	1.00	\$605.00
			1.00	\$605.00
<u>ASSOCIATE</u>				
John C. Gentile	(JCG)	\$355.00	0.20	\$71.00
			0.20	\$71.00
	TOTAL:		1.20	\$676.00

## Employment and Fee Applications

FOR PROFESSIONAL SERVICES RENDERED THROUGH APRIL 30, 2020

Date	Atty	Services	Hours
04/01/20	JCG	Emails to/from L. Molinaro regarding filing BFCA supplement (.1)	0.10
04/01/20	LM	E-file supplemental fee application	0.30
04/03/20	KMC	Communicate with J. Gentile regarding Dentons CNO (0.1)	0.10
04/03/20	JCG	Review various CNO deadlines for committee professionals fee applications and emails to/from K. Capuzzi on same (.2)	0.20
04/07/20	KMC	Communicate with J. Gentile regarding Dentons US Jan CNO (0.1) and review same before filing (0.1)	0.20
04/07/20	JCG	Attention to CNO deadlines and review docket (.4); emails to/from K. Capuzzi regarding same (.1); draft CNO for Dentons (NY) Third Monthly fee app (.3); emails to/from D. Cook regarding CNO and email to L. Molinaro to file same (.2)	1.00
04/07/20	JCG	Review supplement to monthly application of Dentons Bingham regarding january 2020 (.1)	0.10
04/07/20	JCG	Draft CNO regarding Dentons (KY) fee application for January 2020 (.3)	0.30
04/07/20	JCG	Draft CNO regarding BFCA's third monthly fee app (.3)	0.30
04/07/20	LM	E-file supplement to DBG fee application	0.40
04/07/20	LM	E-file certificate of no objection regarding Dentons fee application	0.40
04/10/20	KMC	Communicate with Dentons BG regarding CNO to January monthly fee application (0.1), review CNO (0.1), and attend to filing of same (0.1)	0.30
04/10/20	JRH	Coordinate regarding filing and service of DBG CNOs	0.10
04/10/20	JCG	Emails to/from K. Capuzzi and J. Irving regarding CNO for january monthly fee app (.1); emails to/from K. Capuzzi and file CNO (.2)	0.30
04/10/20	LM	Draft pro hac vice motions of S. Nylen and C. Letkewicz	0.50

Date	Atty	Services	Hours
04/14/20	KMC	Communicate with Lincoln regarding CNO to February fee application (0.1), review CNO regarding Lincoln February fee application (0.1), communicate with Dentons US regarding CNO to February fee application (0.1), review CNO regarding Dentons US February fee application (0.1), and communicate with Dentons BG regarding CNO to first interim fee application (0.1)	0.50
04/14/20	JCG	Draft CNO regarding Lincoln's fourth monthly fee app (.3); emails to/from D. Cook regarding filing of same and related correspondence to confirm no objections (.2); emails to/from K. Capuzzi regarding objection from UST to Benesch 4th monthly (.1); emails to/from J. Hoover regarding preparation of march monthly fee app for BFCA (.1); emails to/from K. Capuzzi regarding confirmation of no objections to Dentons-NY fourth monthly and Dentons-BG first interim fee applications (.1); emails to/from L. Molinaro regarding filing of both CNOs (.2)	1.00
04/14/20	JCG	Draft CNO regarding Dentons-BG (KY) first interim fee app (.3)	0.30
04/14/20	JCG	Draft CNO regarding Dentons (NY) fourth monthly fee application (.3); emails to/from K. Capuzzi regarding review of same and signoff (.1)	0.40
04/14/20	LM	E-file certificate of no objection regarding Lincolns fourth monthly fee application and Dentons US fourth monthly fee application	0.40
04/15/20	KMC	Communicate with Dentons BG regarding CNO to Dentons BG February fee application (0.1), review same (0.1), communicate with J. Gentile regarding CNO to Benesch February fee application (0.1), review same (0.1), and multiple communications with U.S. Trustee regarding Benesch February fee application (0.3)	0.70
04/15/20	JCG	Emails to/from K. Capuzzi regarding CNO for Dentons-BG's february monthly fee app (.1); draft CNO regarding same (.3); emails to/from J. Irving regarding confirmation of no objections (.1); emails to/from K. Capuzzi and L. Molinaro regarding sign-off and filing of same (.1)	0.60
04/15/20	JCG	Finalize CNO regarding BFCA's third monthly fee app for filing today; emails to/from K. Capuzzi on same and L. Molinaro on filing same (.1)	0.20
04/15/20	LM	E-file certificate of no objection to DBG and Benesch fee applications	0.30
04/16/20	JRH	Review and coordinate filing of pro hacs for Nylen and Letkewicz (.2)	0.20

Date	Atty	Services	Hours
04/16/20	JRH	Review revised fee statement and coordinate with J. Gentile on preparation of monthly fee statement (.3)	0.30
04/16/20	JCG	Review pro hacs of S. Nylen and C. Letkewicz prior to filing (.2); emails to/from L. Molinaro and J. Hoover on same and signoff on filing of same (.2)	0.40
04/16/20	JCG	Draft Benesch's fourth monthly fee app (1.5); review interim comp order regarding next round of interim fee applications (.1); emails to/from K. Capuzzi and J. Hoover regarding both (.1); incorporate additional numbers and finalize for review (.3)	2.00
04/16/20	LM	Emails regarding S. Nylen and C. Letkewicz pro hac vice motions	0.20
04/16/20	LM	E-file pro hac vice motions	0.40
04/16/20	LM	Download, save, and circulated granted pro hac vice motions	0.20
04/16/20	LM	Register C. Letkewicz for ECM/ECF	0.30
04/20/20	KMC	Review and revise March fee application (0.5)	0.50
04/20/20	JCG	Review, edit, and finalize BFCA monthly fee application for K. Capuzzi review (.5); review K. Capuzzi comments to same and emails to/from K. Capuzzi regarding certain information in application (.2)	0.70
04/21/20	KMC	Review Dentons US March fee application (0.4), communicate with Dentons US regarding filing of same (0.1), review Lincoln March fee application (0.4), communicate with Dentons US regarding filing of same (0.1), and communicate with J. Hoover and J. Gentle regarding Benesch March fee application (0.2)	1.20
04/21/20	JCG	Finalize BFCA's fourth monthly fee application for J. Hoover review (.2)	0.20
04/21/20	JCG	Review, edit, and finalize Lincoln's fifth monthly fee application and send to L. Molinaro for filing (.5)	0.50
04/21/20	JCG	Review, edit, finalize Dentons (US) NYC fifth monthly fee app, prepare for filing, and send to L. Molinaro for filing, plus emails to/from G. Medina at Dentons regarding same (1.0)	1.00
04/21/20	JCG	Emails to/from all notice parties regarding service of Lincolns and Dentons (US) NYC fee applications (.1)	0.10
04/21/20	LM	E-file Lincoln 5th monthly fee application and Dentons US 5th monthly fee application	0.40



Date	Atty	Services	Hours
04/22/20	KMC	Communicate with J. Gentile regarding LEDES files for Committee professionals (0.1), review Dentons BG March fee application (0.4), and communicate with Dentons BG regarding filing of same (0.1)	0.60
04/22/20	JRH	Follow up regarding open fee applications and next steps	0.20
04/22/20	JCG	Emails to/from J. Hoover and O. Pinkas regarding amounts owed under DIP Amendment and analyze number for J. Hoover and reply with same (.4); further email correspondence to/from O. Pinkas and J. Hoover on same and confirmation of numbers (.2)	0.60
04/22/20	JCG	Emails to/from J. Hoover, K. Capuzzi, UST, and Dentons regarding LEDES files (.3)	0.30
04/22/20	JCG	Review, edit, finalized Dentons-BG's monthly fee application, certification, and notice and send to L. Molinaro for filing (1.0)	1.00
04/22/20	JCG	Emails/correspondence to/from J. Hoover regarding BFCA fee application and filing of same; compile fee app, notice, verification and finalize for filing and send to L. Molinaro for filing; (.4); send fee apps to notice parties regarding service (.1)	0.70
04/22/20	LM	E-file Denton and Benesch fee applications	0.60
04/23/20	KMC	Communicate with J. Hoover regarding Debtors' second interim fee applications (0.2), communicate with Dentons regarding same (0.2), and communicate with J. Hoover and J. Gentile regarding preparation of second interim fee application (0.2)	0.60
04/23/20	JCG	Continued emails to/from J. Hoover and K. Capuzzi regarding interim fee applications and possible motion to shorten (.3); review local rules and interim compensation order in connection with same (.2)	0.50
04/23/20	JCG	Draft motion to shorten regarding motion to compel (1.0); review motion to compel and edit (.3); review, edit, finalize motion to shorten, motion to compel, and all orders/exhibits for filing (.5); continuous emails to/from K. Capuzzi on all (.3)	2.10
04/23/20	JCG	Review, handle, and send LEDES files to UST for Dentons-BG for all fee apps (.2)	0.20
04/23/20	JCG	Catch up call with K. Capuzzi regarding current status of matters for fee apps (.1)	0.10
04/23/20	JCG	Begin drafting Benesch's second interim fee application and exhibits (2.0)	2.00

Date	Atty	Services	Hours
04/24/20	KMC	Review Dentons US second interim application (0.5), communicate with Dentons US regarding filing of same (0.1), review Lincoln second interim fee application (0.5), communicate with Lincoln regarding filing of same (0.1), review Dentons BG second interim application (0.5), communicate with Dentons BG regarding filing of same (0.1), and review Benesch second interim fee application (0.6), and attend to filing of same (0.1), and communicate with Committee professionals regarding filed fee applications (0.2)	2.70
04/24/20	JRH	Review and comment on Benesch second interim fee application and coordinate filing	0.50
04/24/20	JCG	Emails to/from J. Sarkessian regarding LEDES files of Benesch and gathering of same to send (.2)	0.20
04/24/20	JCG	Review, revise, finalize and send to L. Molinaro for filing the supplement for Dentons-BG's first interim fee application (.2)	0.20
04/24/20	JCG	Review, edit, revise, finalize Dentons-BG second interim fee application and exhibits and send to L. Molinaro for filing (.5)	0.50
04/24/20	JCG	Review, edit, revise, finalize Lincoln's second interim fee application and send to L. Molinaro for filing (.5)	0.50
04/24/20	JCG	Review, edit, revise, finalize Dentons NYC second interim fee application and file same (.5); emails to/from Dentons and DLS for service (.2)	0.70
04/24/20	JCG	Draft, revise, compile Benesch second interim fee application, exhibits, notice, certification (3.0); confer continuously with J. Hoover and K. Capuzzi regarding revisions and comments (.5); compile all edits and confirm accuracy of all numbers and budget (1.0); finalize all necessary documents and exhibits and send to L. Molinaro for filing (.5)	5.00
04/24/20	LM	E-file supplement to DBG fee application, Dentons fee application, Lincoln fee application, and Dentons US fee application	1.00
04/27/20	KMC	Communicate with Dentons BG regarding first interim fee order (0.1), communicate with J. Gentile and L. Molinaro regarding preparation of same and COC (0.2), review and revise Dentons BG first interim fee order (0.2), revise COC regarding same (0.2), communicate with UST and Debtors' counsel regarding filing of COC (0.1), and attend to filing of same (0.1)	0.90
04/27/20	JRH	Attention to APA and fee related matters	0.30

Date	Atty	Services	Hours
04/27/20	JCG	Draft interim fee order and exhibit for payment of fees regarding Dentons-Bingham (KY) first interim fee application (.5); emails to/from L. Molinaro and K. Capuzzi on same and related CNO (.1)	0.60
04/27/20	JCG	Draft certification of counsel regarding DBB first interim (.5); emails to/from J. Irving and K. Capuzzi on same (.2)	0.70
04/27/20	JCG	Review interim fee application filed by Bayard (.2)	0.20
04/27/20	LM	Draft certificate of no objection for Dentons interim fee application (.25); e-file certification of counsel regarding Dentons fee application (.25)	0.50
04/28/20	JCG	Emails to/from DLS and L. Molinaro regarding filing AOS for the interim fee applications (.1)	0.10
04/28/20	JCG	Emails to/from DLS and organize all March 2020 monthly and interim fee apps from committee professionals and mail to UST (.2)	0.20

## Employment and Fee Applications

<u>Attorney Name</u>		<u>Hourly Rate</u>	<u>Hours</u>	<u>Amount</u>
<u>PARTNER</u>				
Kevin M. Capuzzi	(KMC)	\$495.00	8.30	\$4,108.50
Jennifer R. Hoover	(JRH)	\$610.00	1.60	\$976.00
			<u>9.90</u>	<u>\$5,084.50</u>
<u>ASSOCIATE</u>				
John C. Gentile	(JCG)	\$355.00	26.10	\$9,265.50
			<u>26.10</u>	<u>\$9,265.50</u>
<u>PARALEGAL</u>				
Louanne Molinaro	(LM )	\$315.00	5.90	\$1,858.50
			<u>5.90</u>	<u>\$1,858.50</u>
		TOTAL:	<u>41.90</u>	<u>\$16,208.50</u>

## Litigation/Other Contested Matters

FOR PROFESSIONAL SERVICES RENDERED THROUGH APRIL 30, 2020

Date	Atty	Services	Hours
04/01/20	KMC	Communicate with J. Hoover regarding challenge matters (0.2) and participate in Committee professionals call regarding complaints (0.9)	1.10
04/01/20	JRH	Prepare for (.2) and conference call with Dentons and Lincoln regarding draft complaints (.8)	1.00
04/01/20	CJL	Review drafts of second complaint	0.60
04/01/20	CJL	Phone call with Dentons and Lincoln to discuss potential litigation strategy and overall case strategy	0.80
04/01/20	CJL	Strategy call with S. Nylen to discuss draft second complaint	0.20
04/01/20	STN	Strategy conference with C. Letkewicz regarding draft challenge complaints	0.20
04/01/20	STN	Conference with J. Hoover regarding challenge issues in prep for Committee professional call	0.20
04/01/20	STN	Prepare for and attend Committee professional conference regarding challenge complaints and related strategy considerations	0.80
04/02/20	KMC	Communicate with J. Hoover and Dentons regarding challenge matters (0.2)	0.20
04/02/20	JRH	Review emails from courtroom deputy regarding next week's hearing (.1)	0.10
04/02/20	JRH	Internal emails regarding hearing scheduling and next steps (.2)	0.20
04/02/20	JRH	Attend and participate in conference call regarding current draft of complaint (.5)	0.50
04/02/20	CJL	Revise second complaint	0.20
04/02/20	CJL	Strategy call with S. Nylen to discuss complaint strategy	0.10
04/02/20	JCG	Review draft complaint against Zohar (.5); review draft complaint against Patriarch and related entities (.5)	0.50

Date	Atty	Services	Hours
04/03/20	JRH	Emails to/from C. Letkewicz regarding Dura meet and confer	0.20
04/03/20	CJL	Meet and confer call with Debtors' counsel concerning outstanding discovery	0.30
04/03/20	CJL	Draft summary of meet and confer call with Debtors' counsel	0.10
04/03/20	STN	Email correspondence with internal working group regarding upcoming meet and confer and other litigation issues	0.40
04/03/20	STN	Review and comment on draft complaint against Zohar	2.00
04/04/20	JRH	Review and comment on revised Patriarch complaint	1.80
04/05/20	KMC	Review communications regarding challenge and discovery matters (0.2)	0.20
04/05/20	JRH	Review and comment on Zohar complaint (1.8)	1.80
04/05/20	CJL	Draft multiple emails to Debtors' counsel concerning scope of production in response to second set of requests for production	0.30
04/06/20	WMA	E-mails with S. Nylen regarding motions to seal	0.10
04/06/20	KMC	Review communications regarding Patriarch complaint and challenge matters (0.2) and communicate with team regarding strategy regarding same (0.2)	0.40
04/06/20	JRH	Dura committee call	0.50
04/06/20	CJL	Review suggested edits to complaint and motion for standing	0.20
04/06/20	CJL	Draft email to J. Kattan concerning complaint strategy	0.20
04/06/20	CJL	Draft email to S. Nylen and J. Hoover concerning complaint strategy	0.20
04/06/20	STN	Email correspondence with co-counsel and internal team regarding upcoming litigation action items and next steps, and analysis of same	0.80
04/06/20	JCG	Review email correspondence from S. Nylen and emails to/from YCST and Dentons regarding extension (.1); phone call with W. Alleman regarding future motion to seal and related emails (.1)	0.20
04/07/20	WMA	E-mails with K. Capuzzi regarding motion to seal for standing motion	0.10

Date	Atty	Services	Hours
04/07/20	KMC	Communicate with W. Alleman regarding motion to seal complaint (0.2), review proposed email to Patriarch and comment on same (0.2), and communicate with J. Hoover regarding challenge extension strategy (0.2)	0.60
04/07/20	JRH	Review email(s) regarding status of discussions with Patriarch (.3); conf. call with S. Nylen regarding approach (.5); email to C. Tullson regarding status (.2)	1.00
04/07/20	JRH	Attention to Patriarch litigation; review and further comment on revised draft(s) (.8)	0.80
04/07/20	JRH	Conf. call with K. Capuzzi regarding Dura litigation	0.20
04/07/20	STN	Strategy conference with J. Irving regarding Zohar challenge issues	0.20
04/08/20	WMA	Review standing motion, e-mails with J. Hoover and S. Nylen regarding same, and draft motion to seal standing motion and complaint	1.00
04/08/20	KMC	Communicate with J. Hoover and S. Nylen regarding challenge matters (0.2), communicate with J. Hoover regarding extension of challenge period (0.2), and review revised Zohar challenge stipulation (0.2)	0.60
04/08/20	JRH	Conf. call with S. Nylen re: Patriarch litigation status	0.50
04/08/20	JRH	Review and comment on current working draft of complaint and confer with C. Letkewicz	1.20
04/08/20	CJL	Revise complaint	1.40
04/08/20	STN	Email correspondence with J. Irving regarding Zohar challenge, including related analysis on DIP and proposed stipulations	1.00
04/08/20	STN	Review and revise standing motion on Bax issue, and consider strategies for addressing same	2.00
04/08/20	STN	Email correspondence with Benesch working group regarding preparations for Patriarch litigation filings	0.50
04/09/20	WMA	Research regarding standing motion issues and drafting memo regarding same	3.70
04/09/20	WMA	Call with S. Nylen regarding standing motion research	0.20
04/09/20	KMC	Review COC and proposed order regarding Zohar challenge (0.2), communicate with J. Hoover regarding same (0.1), review motion to seal standing motion and complaint (0.5), multiple communications with J. Hoover, S. Nylen, and J. Gentile regarding standing	5.60

Date	Atty	Services	Hours
		motion and complaint (0.5), review, revise, and finalize standing motion and complaint for filing (3.9), and attend to service of same (0.4)	
04/09/20	JRH	Conf call with S. Nylen regarding standing motion and status (.4); email update to Committee counsel regarding communications with Skadden (.1)	0.50
04/09/20	JRH	Review and comment on COC and order (Zohar) and coordinate filing	0.50
04/09/20	JRH	Review COC and proposed order regarding Zohar challenge (0.2), communicate with K. Capuzzi regarding same (0.1), review motion to seal standing motion and complaint (0.5), multiple communications with K. Capuzzi, S. Nylen, and J. Gentile regarding standing motion and complaint (0.5), review, revise, and finalize standing motion and complaint for filing (3.9), and attend to service of same (0.4)	5.60
04/09/20	JRH	Conf. call with S. Nylen and follow up regarding various research matters in standing motion	0.50
04/09/20	JRH	Further follow up regarding complaint and draft of motion to file under seal	0.80
04/09/20	CJL	Revise and finalize motion for derivative standing	3.50
04/09/20	CJL	Revise and finalize complaint	1.00
04/09/20	CJL	Multiple strategy calls with S. Nylen concerning motion for derivative standing	0.20
04/09/20	CJL	Review draft motion to seal	0.20
04/09/20	STN	Strategy conference with J. Hoover regarding standing motion issues	0.40
04/09/20	STN	Strategy conference with C. Letkewicz regarding standing motion issues	0.10
04/09/20	STN	Strategy conference with B. Allman regarding standing motion issues	0.10
04/09/20	STN	Review and analysis of motion for standing, Patriarch complaint, and prepare/coordinate same for filing under seal	3.00
04/09/20	JCG	Review, revise, edit standing motion (1.0); check all citations regarding same and complete edits (1.0); draft proposed order regarding same (.3);	2.30



Date	Atty	Services	Hours
04/09/20	JCG	Review, edit, revise, finalize motion for standing, notice of motion, proposed order, complaint with exhibit and continued communications to/from S. Nylen, K. Capuzzi, J. Hoover (3.0; file all documents and effectuate filing under seal (.8); emails to/from K. Capuzzi and J. Hoover regarding service of all (.2)	4.00
04/10/20	WMA	Call from J. Hoover regarding standing motion/Patriarch complaint question	0.20
04/10/20	KMC	Review proposed redactions to standing motion and complaint (0.9), prepare communication to confidentiality parties regarding redaction (0.2), communicate with S. Nylen regarding redaction (0.1), and communicate with J. Hoover regarding redactions (0.2)	1.40
04/10/20	JRH	Prepare communication to confidentiality parties regarding redaction (0.2), communicate with S. Nylen regarding redaction (0.1), and communicate with K. Capuzzi regarding redactions (0.2)	0.50
04/10/20	JRH	Review BAX holding (.3); conf. call with W. Alleman (.2) and follow up email to Dentons re: complaint related matters	0.80
04/10/20	JRH	Conf. call with M. Patterson regarding Tilton complaint filing and protective order	0.20
04/10/20	JRH	Conf. call with J. Irving in light of communications with Court and status of 4/13 hearing	0.30
04/10/20	CJL	Review motion for derivative standing and complaint to determine which portions should be redacted and remain under seal	0.80
04/10/20	STN	Email correspondence with internal team regarding standing motion procedural issues and scheduling with respect to pending motion to extend challenge period	0.30
04/10/20	JCG	Emails to/from S. Nylen regarding service of standing motion and complaint on Zohar Debtors and conform docs per confidential order (.2)	0.20
04/10/20	JCG	Emails to/from C. Letkewicz regarding proposed redactions and next steps (.2)	0.20
04/10/20	JCG	Emails to/from J. Hoover and K. Capuzzi regarding noticing motion to extend (.1); review docket and prior filings regarding same (.1); draft re-notice of motion to extend (.3); facilitate filing of same with L. Molinaro (.1)	0.60

Date	Atty	Services	Hours
04/10/20	JCG	Emails to/from DLS regarding service of the re-notice of motion to extend and notice of motion regarding standing (.2)	0.20
04/13/20	KMC	Multiple communications with J. Hoover, S. Nylen, and C. Letkewicz regarding standing motion, Patriarch complaint, and proposed redactions (0.6)	0.60
04/13/20	JRH	Conference call with S. Nylen regarding upcoming call with K&E and strategy (.3); conference call with Skadden and K&E regarding litigation status and overall matters related to the standing motion (.5); conference call(s) with J. Irving regarding status (.2); internal committee professionals status call (.5)	1.50
04/13/20	JRH	Attend and participate in committee update call	0.50
04/13/20	JRH	Emails with M. Patterson regarding confidentiality order and Barden Hill (.1); review terms of confidentiality order (.5). Review proposed redactions to motion for standing and complaint (.5)	1.10
04/13/20	JRH	Conf call on standing motion and discovery issues with S. Nylen	0.30
04/13/20	CJL	Phone call with Debtors' and Patriarch's counsel concerning motion for derivative standing	0.30
04/13/20	STN	Strategy conference with J. Hoover regarding conference with Debtors and Skadden regarding scheduling on standing motion	0.40
04/13/20	STN	Prepare for and attend conference with Debtors and Patriarch counsel regarding scheduling of standing issues	0.40
04/13/20	STN	Analysis of Patriarch discovery as to Titlon CEO role with respect to 2nd Debtors RFP and email committee counsel teams	1.00
04/13/20	STN	Strategy conference with C. Letkewicz regarding 2nd committee RFP to Debtors' as to CEO documents	0.20
04/13/20	STN	Strategy conference with J. Hoover regarding adjournment of standing motion and Patriarch discovery issues	0.30
04/13/20	JCG	Review proposed redactions to the complaint and motion for standing and related emails to/from J. Hoover (.3)	0.30
04/14/20	WMA	E-mails with J. Hoover regarding motion to seal standing motion	0.10

Date	Atty	Services	Hours
04/14/20	KMC	Review motion to seal standing motion (0.3), review local rule regarding shortening notice on motion to seal (0.1), communicate with J. Hoover regarding sealing of exhibits (0.1), and communicate with J. Hoover regarding Ankura request for access to sealed documents (0.1)	0.60
04/14/20	JRH	Emails with G. Pesce and C. Tullson regarding next steps on Patriarch litigation and proposed path forward (.2); emails with J. Irving regarding status (.1); emails with D. Brogan re: inquiries re: redactions proposed (.1)	0.40
04/14/20	JRH	Follow up emails with C. Tullson and D. Brogan regarding agreement on redactions	0.20
04/14/20	JCG	Review motion to seal, proposed order, and notice (.3)	0.30
04/15/20	WMA	E-mails with J. Hoover regarding motion to seal standing motion	0.10
04/15/20	KMC	Communicate with C. Letkewicz regarding confidentiality agreement (0.1), communicate with counsel to Akura regarding sealed filings (0.2), multiple communications with J. Hoover regarding litigation matters (0.5), review stipulation regarding standing motion (0.4), review motion to seal, redacted filings, and related documents (1.2), communicate with J. Gentile regarding filing and service of same (0.3), and communicate with U.S. Trustee regarding redactions (0.1)	2.80
04/15/20	JRH	Review and revise motion to file under seal and review revised local rules (1.0); emails to/from J. Barry re: redactions, call with D. Brogan re: same; and emails with OUST (.8); final review of all redacted documents and coordinate filing internally (2.5)	4.30
04/15/20	JRH	Review proposed draft stipulation and Order regarding standing motion and complaint and provide comments	0.50
04/15/20	JRH	Emails with Juliet regarding OUST comments on proposed redactions	0.20
04/15/20	CJL	Review Patriarch's requests for production	0.20
04/15/20	JCG	Review local rules on filing redacted documents (.2); confer with J. Hoover on procedure and required documents for motion under seal and redacted documents filing (.2); draft notice of proposed redacted filing (.4); ongoing correspondence to/from K. Capuzzi and J. Hoover regarding redactions (.2); emails to/from J. Hoover regarding the notice of proposed redacted filing (.1)	1.10

Date	Atty	Services	Hours
04/15/20	JCG	Review and edit sealing motion, proposed order, and notice (.5)	0.50
04/15/20	JCG	Phone call with J. Hoover regarding and incorporating edits to the sealing motion, order, notice (.3)	0.30
04/15/20	JCG	Review, edits, finalize motion to seal, order, notice and continued emails/comments from J. Hoover and K. Capuzzi (1.5); review, edit, finalize notice of redacted document (.2); work on redactions to the complaint/standing motion, ensure security of same, emails to/from J. Hoover and UST on comments (1.7); phone call with J. Hoover before filing all documents (.2); facilitate filing of all documents and instructions to L. Molinaro and advise on filing (.4); emails to/from DLS regarding service instructions and AOS (.2)	3.20
04/15/20	SD	Staging of received document production for attorney review	0.30
04/15/20	LM	E-file motion to seal and notice of redacted document	0.50
04/16/20	KMC	Communicate with J. Hoover regarding litigation and challenge matters (0.2), revise stipulation regarding standing motion and related pleadings (0.5), review Patriarch discovery requests (0.6), and communicate internally regarding same (0.2)	1.50
04/16/20	JRH	Prepare for call (.1) and conference call with J. Kattan regarding draft stipulation (.3)	0.40
04/16/20	JRH	Review and comment on draft stipulation, coordinate with K. Capuzzi regarding revisions (.5)	0.50
04/16/20	CJL	Review draft stipulation concerning motion for derivative standing	0.30
04/16/20	CJL	Draft email to J. Kattan concerning draft stipulation strategy	0.10
04/16/20	CJL	Strategy call with S. Nylen, J. Hoover and J. Kattan concerning draft stipulation	0.30
04/16/20	STN	Internal team email correspondence regarding adjournment of standing motion and related discovery issues	0.50
04/16/20	STN	Prepare for and attend strategy conference with J. Katten and Benesch team related to discovery issues and relation to standing motion	0.30

Date	Atty	Services	Hours
04/16/20	JCG	Review emails to/from UST regarding redactions to the complaint and motion for standing (.1); emails to/from J. Hoover regarding same and how to handle (.1); review the proposed redactions from the UST (.1)	0.30
04/17/20	KMC	Communicate with J. Hoover regarding Patriarch litigation (0.2), review Zohar agenda for April 21 hearing (0.2), communicate with L. Molinaro regarding telephonic appearance at same (0.1), review COC and proposed order regarding standing motion (0.3), and review order granting same (0.1)	0.90
04/17/20	JRH	Communicate with J. Hoover regarding Patriarch litigation (0.2)	0.20
04/17/20	JRH	Review final draft of stipulation regarding briefing and related items (.2)	0.20
04/17/20	JCG	Emails to/from DLS and L. Molinaro regarding filing of AOS regarding filing of motion to seal (.2)	0.20
04/18/20	JRH	Conference call with S. Nylen regarding status and next steps in light of APA (.2); conference call with K. Capuzzi (.2)	0.50
04/20/20	KMC	Review Zohar re-notice of motion to extend challenge deadline (0.1), review Zohar amended motion to extend challenge deadline (0.3), communicate with J. Hoover regarding same (0.1), and prepare communication to U.S. Trustee regarding redactions to standing motion and proposed Patriarch complaint (0.1)	0.60
04/20/20	JRH	Conference call with S. Nylen regarding strategy (.3)	0.30
04/20/20	JRH	Initial review of Patriarch initial response to standing motion and complaint (.5)	0.50
04/20/20	JRH	Emails with counsel to Debtors and Patriarch regarding proposed redactions and comments of the OUST	0.30
04/20/20	CJL	Draft correspondence to Debtors' counsel and Patriarch's counsel concerning production of L. Tilton emails concerning post-bankruptcy sales process	0.40
04/20/20	CJL	Review preliminary objection filed by Patriarch to motion for derivative standing	0.30
04/20/20	JCG	Emails to/from K. Capuzzi, J. Hoover, and UST regarding redactions and no position (.1)	0.10
04/21/20	KMC	Review Patriarch objection to standing motion (0.6), communicate with J. Hoover regarding same and next steps (0.2), review Zohar pleadings regarding portfolio control for any effect on Dura cases and attend Zohar hearing on portfolio control (1.6)	2.40

Date	Atty	Services	Hours
04/21/20	JRH	Further review objection (.3) and conference call with K. Capuzzi (.2)	0.50
04/22/20	CJL	Strategy call with S. Nylen concerning meet and confer call with Debtors concerning L. Tilton emails	0.20
04/22/20	CJL	Meet and confer phone call with Debtors' counsel concerning L. Tilton emails	0.20
04/22/20	CJL	Strategy call with S. Nylen to discuss follow up strategy in response to meet and confer with Debtors' counsel	0.30
04/22/20	CJL	Draft correspondence to Patriarch's counsel concerning L. Tilton emails	0.30
04/22/20	STN	Prepare for and attend strategy conference with C. Letkewicz regarding upcoming meet and confer with Debtors on CEO emails regarding sale process	0.20
04/22/20	STN	Attend meet and confer with C. Letkewicz regarding CEO emails on post-petition sale process	0.20
04/22/20	STN	Strategy conference with C. Letkewicz on status and going forward discovery and litigation issues	0.30
04/22/20	JCG	Review the objection to the standing motion filed by Patriarch (.5)	0.50
04/22/20	JCG	Emails to/from J. Hoover regarding motion to shorten and review emails from O. Pinkas regarding non-payment of fees under DIP Amendment (.1); follow up correspondence regarding same with J. Hoover (.2); begin building out motion to shorten (.2)	0.50
04/23/20	JRH	Participate in conf call with chambers related to DIP matters	0.50
04/23/20	CJL	Draft multiple emails to Patriarch's counsel concerning L. Tilton emails	0.10
04/26/20	JRH	Review and comment on RFP and review email from S. Nylen with comments to the committee	0.50
04/26/20	CJL	Strategy call with S. Nylen to discuss L. Tilton post-bankruptcy petition emails and Patriarch document requests	0.30
04/26/20	STN	Prepare for and attend strategy conference with C. Letkewicz regarding Patriarch discovery issues	0.30

Date	Atty	Services	Hours
04/26/20	STN	Prepare for and attend conference call amongst committee professionals regarding strategy and tactics with respect to proposed sale and Patriarch issues, and follow-up email to professionals regarding action items	0.80
04/27/20	CJL	Strategy call with S. Nylen to discuss Patriarch meet and confer strategy	0.20
04/27/20	CJL	Meet and confer call with Patriarch's counsel concerning L. Tilton's emails regarding post-petition sales process	0.30
04/27/20	STN	Prepare for and attend strategy conference with C. Letkewicz regarding preparation for upcoming meet and confer with Patriarch counsel	0.20
04/27/20	STN	Attend meet and confer with C. Letkewicz and Skadden team regarding Tilton emails in response to RFP to Debtors on post petition sale process, and follow-up conference with C. Letkewicz	0.30
04/27/20	SD	Staging of received document production for attorney review	0.30
04/28/20	KMC	Communicate with J. Hoover regarding sale and litigation matters (0.2) and review litigation hold letter to committee members (0.3)	0.50
04/28/20	JRH	Review responses to RFP and confer with S. Nylen re: same	0.50
04/28/20	CJL	Draft responses and objections to Patriarch's requests for production	2.40
04/28/20	CJL	Revise litigation hold	0.10
04/29/20	JRH	Review emails and confirm regarding lit hold letter with C. Letkewicz	0.20
04/29/20	CJL	Draft correspondence to Committee concerning litigation hold	0.30

## Litigation/Other Contested Matters

<u>Attorney Name</u>		<u>Hourly Rate</u>	<u>Hours</u>	<u>Amount</u>
<u>PARTNER</u>				
William M. Alleman, Jr.	(WMA)	\$495.00	5.50	\$2,722.50
Kevin M. Capuzzi	(KMC)	\$495.00	20.00	\$9,900.00
Jennifer R. Hoover	(JRH)	\$610.00	33.60	\$20,496.00
Christopher J. Letkewicz	(CJL)	\$605.00	16.90	\$10,224.50
Sven T. Nylén	(STN)	\$605.00	17.40	\$10,527.00
			<u>93.40</u>	<u>\$53,870.00</u>
<u>ASSOCIATE</u>				
John C. Gentile	(JCG)	\$355.00	15.50	\$5,502.50
			<u>15.50</u>	<u>\$5,502.50</u>
<u>PARALEGAL</u>				
Steven Delaney	(SD )	\$285.00	0.60	\$171.00
Louanne Molinaro	(LM )	\$315.00	0.50	\$157.50
			<u>1.10</u>	<u>\$328.50</u>
TOTAL:			<u>110.00</u>	<u>\$59,701.00</u>



## Financing/Cash Collateral

FOR PROFESSIONAL SERVICES RENDERED THROUGH APRIL 30, 2020

Date	Atty	Services	Hours
04/12/20	KMC	Review communication regarding further DIP amendment (0.1)	0.10
04/12/20	JRH	Emails regarding expedited motion re: DIP financing	0.20
04/13/20	KMC	Review motion and proposed order to enter into DIP amendment (0.7), review motion to shorten same (0.2), review order shortening notice (0.1)	1.00
04/13/20	JRH	Review amended DIP filings	0.80
04/13/20	JCG	Review supplement to debtors motion to enter into DIP amendment (.2); review motion to shorten in connection with same (.1)	0.30
04/16/20	KMC	Review order approving DIP amendment (0.2)	0.20
04/16/20	JRH	Follow up regarding today's hearing and entry of Order (.2)	0.20
04/16/20	JCG	Review order granting debtors' ability to enter into DIP amendment (.2)	0.20
04/22/20	KMC	Review communications regarding financing issues (0.2), review and comment on proposed email to Court regarding potential motion to enforce DIP amendment order (0.2), participate in committee professionals' call regarding financing and sale issues (1.2), communicate with J. Hoover regarding same (0.2), and review committee update email (0.1)	1.90
04/22/20	JRH	Conf. call with committee professionals re: DIP matters and status of sale (.7)	0.70
04/23/20	KMC	Review motion and comment on to enforce DIP order (1.2), multiple communications with Committee professionals regarding same (0.7), review and revise motion to shorten (0.9), multiple communications with Debtors' counsel regarding filings (0.2), communicate with Court regarding Chambers conference prepare for same (0.2), attend chambers conference (0.6), communicate with Committee professionals regarding outcome of same (0.3), and communicate with J. Irving and J. Hoover regarding further negotiations (0.4)	4.50

Date	Atty	Services	Hours
04/23/20	JRH	Follow up regarding amendment to DIP and related matters	0.30
04/24/20	KMC	Multiple communications with Committee professionals regarding DIP payments and resolution of emergency motion matters (0.4)	0.40

## Financing/Cash Collateral

<u>Attorney Name</u>		<u>Hourly Rate</u>	<u>Hours</u>	<u>Amount</u>
<u>PARTNER</u>				
Kevin M. Capuzzi	(KMC)	\$495.00	8.10	\$4,009.50
Jennifer R. Hoover	(JRH)	\$610.00	2.20	\$1,342.00
			<u>10.30</u>	<u>\$5,351.50</u>
<u>ASSOCIATE</u>				
John C. Gentile	(JCG)	\$355.00	0.50	\$177.50
			<u>0.50</u>	<u>\$177.50</u>
		<u>TOTAL:</u>	<u>10.80</u>	<u>\$5,529.00</u>

## Plan and Disclosure Statement

FOR PROFESSIONAL SERVICES RENDERED THROUGH APRIL 30, 2020

Date	Atty	Services	Hours
04/02/20	JCG	Review draft term sheet regarding possible sale of foreign based assets (.2)	0.20
04/17/20	KMC	Review notice of adjournment of plan hearing (0.1)	0.10
04/29/20	JRH	Review motion to extend exclusivity	0.20
04/30/20	KMC	Review second motion to extend exclusivity period (0.2)	0.20

## Plan and Disclosure Statement

<u>Attorney Name</u>		<u>Hourly Rate</u>	<u>Hours</u>	<u>Amount</u>
<u>PARTNER</u>				
Kevin M. Capuzzi	(KMC)	\$495.00	0.30	\$148.50
Jennifer R. Hoover	(JRH)	\$610.00	0.20	\$122.00
			<u>0.50</u>	<u>\$270.50</u>
<u>ASSOCIATE</u>				
John C. Gentile	(JCG)	\$355.00	0.20	\$71.00
			<u>0.20</u>	<u>\$71.00</u>
		TOTAL:	<u>0.70</u>	<u>\$341.50</u>

SUMMARY OF EXPENSES INCURRED FOR THE PERIOD  
JANUARY 1, 1901 THROUGH APRIL 30, 2020

<u>Expense</u>	<u>Amount</u>
Outside Professional Services	\$213.25
Conference Calls	\$33.00
E-Discovery/document platform \$16/gb	\$2,560.00
	<hr/>
TOTAL:	<hr/> <u>\$2,806.25</u>

## Long Distance Calls

<u>Date</u>	<u>User</u>	<u>Description</u>	<u>Amount</u>
04/20/20	LM	Conference Calls - Vendor: CourtCall, LLC 4-4	33.00
TOTAL:			<u>\$33.00</u>

**Outside Professional Services**

<u>Date</u>	<u>User</u>	<u>Description</u>	<u>Amount</u>
04/30/20	LM	Outside Professional Services - Vendor: DLS Discovery, LLC PRINTING - ENVELOPE - MERGE ADDRESSES AND POSTAGE	213.25
		TOTAL:	<hr/> \$213.25



**E-Discovery/document platform \$16/gb**

<u>Date</u>	<u>User</u>	<u>Description</u>	<u>Amount</u>
04/06/20	DSM	E-Discovery/document platform \$16/gb - Vendor: Everlaw, Inc..-3/31/20	2,560.00
		TOTAL:	<hr/> \$2,560.00